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10		DISTRICT COURT
	NORTHERN DISTRICT OF CALIFORNIA CAN ED ANCICCO DIVISION	
11	SANTRANCIS	
12	JUAN FLORES-MENDEZ, an individual and TRACEY GREENAMYER, an individual,	Case No.: 3:20-cv-04929-WHA
13	and on behalf of classes of similarly situated	DECLARATION OF KILEY LYNN
14	individuals,	GROMBACHER IN SUPPORT OF PLAINTIFF'S REPLY IN SUPPORT OF
15	Plaintiffs,	MOTION TO STRIKE UNTIMELY
16	VS.	DISCLOSED EVIDENCE AND WITNESSES
		WIII
17	ZOOSK, INC., a Delaware corporation,	
18	Defendant.	
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28		DECLARATION OF DECLARATION OF KILEY LYNN

1	Additional Counsel for Plaintiffs and the Putative Class:
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DECLARATION OF KILEY LYNN GROMBACHER

I, Kiley Lynn Grombacher hereby declare as follows:

- 1. I am a partner in the law firm Bradley/Grombacher LLP. I am counsel for Plaintiffs Tracy Greenamyer and Juan Flores-Mendez.
- 2. I am thoroughly familiar with, and have personal knowledge of, all of the facts set forth herein. If called as a witness, I could and would competently testify to the information set forth below.
- 3. I have prepared this Declaration in Support of Plaintiffs' Reply in Support Of Motion To Strike Untimely Disclosed Evidence And Witnesses, which is filed contemporaneously herewith.
- 4. Promptly upon discovery of issues involving the potential adequacy of Plaintiffs Collins and Flores-Mendez, counsel for Plaintiffs continued with prior efforts to interview Zoosk subscribers who could serve as substitute class representatives.
- 5. To this end, counsel for Plaintiffs met and conferred telephonically with counsel for Zoosk regarding Plaintiff Flores-Mendez's proposed amendment.
- 6. Following the conference, on February 3rd and 4th respectively, Zoosk requested and counsel for Plaintiffs provided the email address associated with Plaintiff Greenamyer's Zoosk account.
- 7. A true and correct copy of the email chain referenced above it attached hereto as Exhibit "A".
- 8. Although the parties conferred regarding Plaintiff Greenamyer joining this litigation, Zoosk never advised Plaintiffs' counsel that it had any basis to dispute that Plaintiff Greenamyer was a member of the putative class. Nor did Zoosk's counsel challenge her membership in the class (*i.e.*, standing) in its opposition to Plaintiff Flores-Mendez' Motion to Substitute
- 9. Given that Plaintiffs had no reason to believe Zoosk would challenge Plaintiff Greenamyer's membership in the class, nor did they have access to Zoosk's records which would have placed them on notice of such potential defense, they terminated vetting interviews with other potential class representatives.

1	10. Presently, however, at least one individual has committed to serving as a class	
2	representative should the Court find Plaintiff Greenamyer cannot serve in her proposed role.	
3	I declare under penalty of perjury under the laws of the State of California and the United	
4	States of America that the foregoing is true and correct. Executed July 13, 2022 in Westlake	
5	Village, California.	
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7	/s/ Kiley Grombacher Kiley Grombacher	
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